

UNITED STATE BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE

LOELIZ E VELAZQUEZ RODRIGUEZ  
HECTOR L ORTIZ ALICEA

DEBTOR(S)

CASE NO. 16-03912-ESL

CHAPTER 13

**OBJECTION TO CONFIRMATION**

**TO THE HONORABLE COURT:**

Comes now, **RELIABLE FINANCIAL SERVICES, INC.**, holder of a secured claim and Movant herein, through the undersigned attorney very respectfully Alleges and Prays:

1. Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code on **May 16, 2016**.

2. On today's date, Movant filed a Proof of Claim in the amount of **\$3,507.780** as a secured claim with evidence of its security.

3. Movant's objects to the proposed Chapter 13 plan dated **May 16, 2016** which proposes to pay Reliable's claim in full through the Trustee. Such plan does not provide for adequate protection payments to this secured claim since Movant will not receive payments until approximately **Twenty-one (21)** months after the confirmation of plan. This delay in payments is prejudicial to Movant.

4. For all the aforementioned, debtor's Chapter 13 Plan should be amended to provide for adequate protection to this secured claim, in accordance with the requirements set forth in 11USC Section 361.

**WHEREFORE**, Movant prays this Honorable Court that debtor's Plan be denied confirmation at the hearing on confirmation and for such other relief as may appear appropriate to the Court.

**NOTICE**, Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

**CERTIFICATE OF SERVICE**

I hereby certify that the present motion was filed electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Trustee and Debtor(s) Attorney and that we have sent copy of this document through regular mail to Debtor(s) and all non CM/ECF participants interested parties to their address of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico this May 18, 2016.

**/S/ CARLOS E. PEREZ PASTRANA**  
**USDC-208913**  
Attorney for Movant  
PO BOX 21382  
SAN JUAN, PR 00928-1382  
TEL. 787-625-6645 FAX: 787-625-6680  
[cperezp@reliablefinancial.com](mailto:cperezp@reliablefinancial.com)